

PRIVACY STATEMENT

A. About this Privacy Statement

1. The purpose of this Privacy Statement is to inform you of how Fraser and Neave, Limited and its subsidiaries (collectively referred to as the "**F&N GROUP**", "**we**", "**us**" or "**our**"), manage your Personal Data.
2. This Privacy Statement applies to all F&N GROUP websites ("**Group Websites**"), and describes how we collect, use, disclose and process your Personal Data including Personal Data we have collected about you and Personal Data that you have provided to us through the Group Websites or otherwise.
3. Although this Privacy Statement is in common use by F&N Group, except where applicable laws provide otherwise, each entity within F&N Group is only responsible to you in relation to its own collection and use of your Personal Data and its own actions.
4. We are committed to safeguarding your Personal Data. This Privacy Statement supplements but does not supersede or replace any other consents you may have provided to us, or any other agreements or arrangement that you may have with us, in respect of your Personal Data. Your consents herein are additional to any rights which the F&N GROUP may have to collect, use and disclose your Personal Data.
5. By providing us with your Personal Data, whether through the Group Websites or otherwise, you consent, agree and accept that we, as well as our respective representatives and/or agents may collect, use, disclose and share among ourselves your Personal Data as described in this Privacy Statement.

B. Amendments to this Privacy Statement

6. We review and may amend this Privacy Statement from time to time to reflect changes in applicable laws or the way we handle Personal Data. The updated Privacy Statement will supersede earlier versions and will apply to Personal Data provided to us previously. You are encouraged to re-visit our Privacy Statement from time to time to keep yourself updated on these changes.

C. What Personal Data We Collect

7. **What is Personal Data.** In this Privacy Statement, "**Personal Data**" refers to data that can be used to identify a natural person. Examples of Personal Data include name, address, contact details, identification numbers, IP address, transactional information based on your activities on our website and applications, telephone numbers, email address, images and any other information of a personal nature.
8. **Voluntary provision of Personal Data.** We collect Personal Data that you voluntarily provide to us. What Personal Data we collect depends on the purposes for which the Personal Data is collected and what you have chosen to provide.

You can choose not to provide us with Personal Data. If you have provided consent, you also have the right to withdraw your consent by contacting us in accordance with Paragraph 26. However, if you do so, it may not be possible for us to fulfil the purposes for which we require the Personal Data, including processing your transactions or providing you with the products and services that you require.

9. **Providing Personal Data belonging to others.** If you provide the Personal Data of anyone other than yourself (e.g. your family members), you are responsible for informing him/her of the specific purposes for which we are collecting his/her Personal Data and to ensure that he/she has provided valid consent for your provision of his/her Personal Data to us.

10. **Accuracy and Completeness of Personal Data.** It is important that the Personal Data we hold about you is accurate and up to date. It is your responsibility ensure that all Personal Data that you provide is accurate and complete and to inform us of relevant changes to your Personal Data.
11. **Minors.** If you are a minor under 16 years of age, please obtain consent from your parent or guardian before you submit any Personal Data to us. If you are a parent or guardian of a minor and you have reason to believe your child or ward has provided us with their Personal Data without your prior consent, please contact us to request for erasure of their Personal Data or for the minor to be unsubscribed from our mailing lists.

D. How We Collect Personal Data

12. **Personal Data you provide.** We collect Personal Data that is relevant to our relationship with you. Your Personal Data may be collected by us, directly or indirectly, for instance:
 - when you visit Group Websites with a cookies-enabled browser or register a user account with Group Websites or use some of our website services and mobile applications including establishing any online accounts with us;
 - when you conduct any online transactions (such as online shopping or making online purchases or bookings) on Group Websites or through our third party service providers, or such other service providers we may use from time to time;
 - when you download or use any of our mobile applications (apps);
 - when you apply to be a member of any of our programmes including loyalty programmes;
 - when you enter or respond to or participate in our promotions, initiatives, competitions, games or contests;
 - when you attend our sales and marketing events or functions;

- when your images are captured via photographs or videos of you taken when you participate in events organized by us;
- when you subscribe to our mailing lists for email subscription, postal promotions or phone or other forms of marketing (such as via telephone calls, messaging by SMS/MMS and WhatsApp);
- when you communicate or interact with us by telephone, email via our websites or through other communication channels, for example social media platforms or face to face meetings;
- when we seek information about you and receive your Personal Data in connection with your relationship with us. For example, if you are an investor or shareholder of organisations within F&N Group;
- when you submit an employment, internship or secondment application to us or when you provide documents or information including your resume/CVs in connection with such applications; and/or
- when you submit your Personal Data to us for any other reason.

13. **Personal Data Provided by others.** Depending on your relationship with us, we may also collect your Personal Data from third party sources, for example:

- from our business partners such as third parties providing advertising, marketing and promotional services to us;
- from your referees, educational institutions or previous employers (if you have applied to us for a job);
- from your family members or friends who provide your Personal Data to us on your behalf; and/or
- from public agencies or other public sources.

E. Purposes for Collection, Use or Disclosure of Your Personal Data

14. **General Purposes.** Generally, we collect, use, disclose and process your Personal Data for purposes connected or relevant to our business or to manage your relationship with us. Depending on the jurisdiction you are in and where the relevant F&N Group entity operates, the F&N GROUP and our third party service providers as the case may be, may use your Personal Data:

- to facilitate and process your transactions with us, or to provide products and services to you;
- for administrative purposes, including to facilitate your participation in our promotions, sales initiatives or contests, to evaluate your preferences, to facilitate your access to Group Websites and for the maintenance of the Group Websites and other quality assurance purposes;
- to register you as a member of any of our programmes (including loyalty programmes) and to provide you the benefits of such membership;
- to send you promotional and marketing material via email, post or telephone where appropriate;
- to carry out research and statistical analysis including development of new products and services or evaluation and improvement of our existing products and services;
- to answer your queries or provide you with assistance in any other way including resolving complaints and assisting you with your requests enquiries and feedback;
- to comply with any applicable rules, laws, regulations, codes of practice or guidelines issued by any legal or regulatory body which are binding on us;
- enforcing legal obligations owed to us or responding to complaints, litigation or investigations concerning us;

- such other purposes that may be informed to you when your Personal Data is collected; and/or
- any other reasonable purpose related to the aforesaid.

15. **Marketing Purposes.** If you have given your consent, we may use your Personal Data for the purposes of marketing our products and services and those of our strategic partners and business associates for marketing and communication purposes e.g. informing you of our latest activities, special offers and promotions. In order for us to market products and services which are of special interest and relevant to you, we may analyse and rely on your overall interaction with us (such as but not limited to your participation in promotions or events and your interactions with us).

16. **How We Share Your Personal Data** Depending on the jurisdiction you are in or where the relevant F&N Group entity operates, in order to fulfil the above purposes, we may share your Personal Data with the following entities:

- Other entities of the F&N GROUP;
- Third-party vendors and service providers (such as subcontractors, agents or network operators) who are employed to perform business, support, operational and/or administrative functions such as marketing, payment, fulfillment and delivery of orders;
- Third parties with whom we conduct joint marketing and/or cross-promotions, including providing rewards or benefits; and
- Our professional advisers such as auditors and lawyers.

Some of the above entities may be located outside of the country/region where your data was first collected by the relevant F&N Group Entity. Where this is the case, your Personal Data may be transferred overseas from time to time. Such transfers will be carried out in accordance with relevant data protection laws.

Third parties are subject to confidentiality obligations and may only use your Personal Data to perform the necessary functions and not for other purposes.

17. **Use of Cookies.** A cookie is a small piece of information that is placed on your Internet browsing software (the “**browser**”) by a website that you visit. It helps the website to remember information about your visit to make your next visit easier and the site more useful to you.

We may use cookies on Group Websites for the following purposes:

- To enable certain features and functions on Group Websites (e.g. remembering your user-ID, browsing and other product and/or service preferences);
- To identify the causes of problems arising at web servers and to resolve these problems or improve efficiency of Group Websites;
- To improve the contents of Group Websites and emails from us;
- To customize the contents of Group Websites and emails from us to suit your individual interests or preferences;
- To utilize your browsing history on Group Websites and the results of questionnaires for market research or marketing, including sending you advertisements via Group Websites;
- To obtain aggregated Group Website usage and visitation statistics;
- To administer services to you; and
- For purposes which are reasonably related to the aforesaid.

You may reject the use of cookies on Group Websites by configuring your browser to disable the use of cookies. However, this may result in the loss of functionality which may restrict your use of Group Websites and/or delay or affect the way in which it operates. If you disable the use of cookies, you may no longer be able to receive personalized features of Group Websites, which rely on the use of cookies.

18. **Links to Third Party Websites.** Group Websites may contain links to other third party websites and microsites, whose privacy practices may differ from ours. If

you submit Personal Data to any of those sites, your Personal Data is not subject to this Data Protection and Privacy Statement.

We encourage you to review the privacy statement of any site you visit. By clicking on or activating such links and leaving Group Websites, we can no longer exercise control over any data or information which you give to any other entity after leaving Group Websites. Any access to such other sites or pages is therefore entirely at your own risk. We are not responsible for the Personal Data policies (including Personal Data protection and cookies), content or security of any third party websites linked to or from Group Websites.

19. **Legitimate Interests and other legal basis for processing.** In addition to collecting, using, disclosing and processing your Personal Data with your consent or for performance of a contract entered with you, we may also use and process your Personal Data to support our legitimate business interests in accordance with applicable data protection laws.
20. **Use permitted under applicable laws.** We may also collect, use, disclose and process your Personal Data without your knowledge or consent where this is required or permitted under law.
21. **Contacting you.** When we contact or send you information for the purposes described in Part E above, we may do so by post, e-mail, SMS, telephone or such other means provided by you. If you do not wish to receive any communication or information from us, or wish to restrict the manner by which we may contact or send you information, you may contact us in accordance with Paragraph 26.

F. SECURITY AND RETENTION OF PERSONAL DATA

22. **Unauthorised Access.** While precautions will be taken to ensure that the Personal Data you provide is protected against unauthorized or unintended access, we cannot be held responsible for unauthorized or unintended access that is beyond our control.
23. **Vulnerabilities.** We do not guarantee that our systems or applications are invulnerable to security breaches nor do we make any warranty, guarantee or

representation that your use of our systems or applications is safe and protected from viruses, worms, Trojan horses and other vulnerabilities. We also do not guarantee the security of data that you choose to send us electronically. Sending such data is entirely at your own risk.

24. **Period of Retention.** Your Personal Data will be retained for as long as it is necessary to fulfill the purpose for which it is collected or for business or legal purposes, or in accordance with applicable laws. Should you choose to unsubscribe from our mailing list or if your membership expires, please note that your Personal Data may still be retained on our database to the extent permitted by law.
25. **Anonymised Data.** In some circumstances we may anonymise your Personal Data so that it can no longer be associated with you, in which case we are entitled to retain and use such data without restriction.

G. Your Rights

ACCESSING AND AMENDING YOUR PERSONAL DATA

26. Depending on the jurisdiction you are in or where the relevant F&N Group entity operates, you may enjoy certain rights at law in relation to our collection, use, disclosure and processing of your Personal Data. Such rights include:

- **Access and Correction:**

You may review and amend your Personal Data, or withdraw your consent to our use of your Personal Data, at any time by signing into your user account (where applicable) and selecting "Update Profile" (or equivalent) or by contacting us as follows:

Email: *[insert relevant email address (e.g. dpo@fraserandneave.com)]*

When contacting the Data Protection Officer for assistance, please state (where relevant) your name, address, contact details and Customer/Membership Number.

Please allow ten (10) working days for your request to be processed.

- **Withdrawing Consent:**

If you withdraw your consent to any or all use of your Personal Data, depending on the nature of your request, we may not be able to provide or continue providing our products and services to you, or administer any contractual relationship already in place. You understand and agree that in such instances where we require your Personal Data to fulfil a contractual obligation to you and you withdraw your consent to collect, use or disclose the relevant Personal Data for those purposes, we cannot be held liable for breach of that agreement. Our legal rights and remedies in such event are expressly reserved.

27. If you wish to exercise your rights, you may contact us in accordance with Paragraph 26. We may require that you submit certain forms or provide certain information to process your request. Where permitted by law we may also charge you a fee to process your request.
28. **Limitations:** We may be permitted under applicable laws to refuse a request, for example, we may refuse an access request in respect of (a) opinion data or (b) Personal Data which is subject to legal privilege.

H. CONTACT US

29. If you have any feedback or issues in relation to your Personal Data, or about this Privacy Statement, you may contact us as set out below.

Email: *[insert relevant email address (e.g. dpo@fraserandneave.com)]*

When you contact us, we may require that you submit certain forms or provide certain information, including verification of your identity, before we are able to respond.